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November 27, 2023

VIA ECF

Honorable P. Kevin Castel
District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Josue G. Torres v. City of New York et al.*, 23-CV-04258 (PKC)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and attorney for defendants City of New York, Keechant L. Sewell, Denis O'Hanlon, Barry Driscoll, James Wilson, and Elvis Cornea in the above referenced matter. I write to respectfully request that the Court, *sua sponte*, grant a brief enlargement of time, from November 27, 2023 to December 8, 2023 for Defendants Amy J. Litwin, Lauren Silverstein, and Christine M McGrath to answer or to otherwise respond to the complaint. This is defendant's fourth request for an enlargement and Plaintiff's counsel, Eric Sanders, consents to this request. In accordance with Your Honor's Individual Rule 1.A.iii, the next conference before the Court is currently scheduled for December 11, 2023 and the requested extension should not impact that conference.¹

The reason for this request is that the undersigned only recently received documentation necessary to resolve representation with these individuals and additional time is needed for the undersigned to meet with them to resolve representation. This should not impact any other deadlines in this case and the undersigned will be prepared to attend the December 11, 2023 Initial Conference. Accordingly, it is respectfully requested that the Court *sua sponte* grant an

¹ The undersigned previously submitted the instant request, however, in the original request did not comply with Rule 1.A.iii of Your Honor's Individual Rules. Accordingly, this letter is being re-submitted with the required information and the undersigned apologizes for not having included it in the first submission.

*Time to answer
extended to December 8.
The answer date does,
indeed,
require adjustment
of the IPTC date because
of the pre-motion letter
process. Confuse
adjourned
from
December
11
to
January 12, 2024
at
11:00 a.m.
SO
ORDERED
USDJ
11-30-23*

enlargement of time, from November 27, 2023 until December 8, 2023, for Defendants Litwin, Silverstein, and McGrath to respond to the complaint.

I thank the Court for its time and consideration of the within request.

Respectfully submitted,

Thomas Lai s/

Thomas Lai

Senior Counsel

Special Federal Litigation Division

To: **VIA ECF**

Eric Sanders

Attorney for Plaintiff